

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

**CERTIFICATION OF  
VICTORIA DAVIS  
LOCKARD, ESQ.**

VICTORIA DAVIS LOCKARD, ESQ., being of full age, certifies as follows:

1. I am a Shareholder at Greenberg Traurig, LLP, attorneys for Defendants Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Actavis Pharma, Inc., and Actavis LLC. I make this Certification based on personal knowledge and in support of Defendants' Joint Motion to Exclude the Opinions of Philip Russ.

2. Attached hereto as Exhibit A is a true and accurate copy of the Expert Report of Philip Russ, dated October 31, 2022, with Appendices A-B, served in MDL 2875. This document has been filed under seal because it contains information that has been designated as "PROTECTED INFORMATION" as defined in the applicable Amended Confidentiality and Protective Order [[ECF No. 1661](#)].

3. Attached hereto as Exhibit B is a true and accurate copy of the transcript of the deposition of Philip Russ, in MDL 2875, dated January 5, 2023.

Dated: March 13, 2023

Respectfully submitted,

/s/ Victoria Davis Lockard

Victoria Davis Lockard  
GREENBERG TRAURIG, LLP  
Terminus 200  
3333 Piedmont Road, N.E.,  
Suite 2500  
Atlanta, Georgia 30305  
Tel.: (678) 553-2103  
Fax: (678) 553-2104  
LockardV@gtlaw.com

*Counsel for Teva Pharmaceuticals  
USA, Inc., Teva Pharmaceutical  
Industries Ltd., Actavis Pharma, Inc.,  
and Actavis LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 13, 2023, a copy of the foregoing document was served on all counsel of record via CM/ECF.

By: /s/ Steven M. Harkins  
Steven M. Harkins